

1 LUCIAN J. GRECO, JR., ESQ.
2 Nevada State Bar No. 10600
3 JARED G. CHRISTENSEN, ESQ.
4 Nevada State Bar No. 11538
5 DELEELA M. WEINERMAN, ESQ.
6 Nevada State Bar No. 13985
7 BREMER WHYTE BROWN & O'MEARA LLP
8 1160 N. TOWN CENTER DRIVE
9 SUITE 250
LAS VEGAS, NV 89144
TELEPHONE: (702) 258-6665
FACSIMILE: (702) 258-6662
lgreco@bremerwhyte.com
jchristensen@bremerwhyte.com
dweinerman@bremerwhyte.com
9 Attorneys for Defendant,
JAMES RIVER INSURANCE COMPANY

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

14 MARK A. ST. AMAND, an individual,) Case No. 2:20-cv-01666-JCM-DJA
15 Plaintiff,)
16 vs.)
17 JAMES RIVER INSURANCE COMPANY;)
18 DOES Employees 1-10; DOE Individuals 11-)
20; ROE Corporations 21-30, inclusive,)
19 Defendants.)

)

21 All of the parties hereto, and for good cause described in this stipulation, and in
22 accord with Local Rule 6-1 and Local Rule 26-3, the parties hereby request this
23 Honorable Court to adopt and approve this stipulated extension to the discovery plan
24 and continue the discovery deadlines for 90-days as requested herein.

I. LOCAL RULE IA 6-1 IS SATISFIED

26 This is the first request for extension of discovery deadlines filed by the parties.
27 Pursuant to the Discovery Plan and Scheduling Order from October 9, 2020, the
28 following dates govern for purposes of discovery:

1	1. Discovery Cutoff Date:	June 14, 2021
2	2. Amendment of Pleadings:	March 16, 2021
3	3. Expert Designations:	April 15, 2021
4	4. Rebuttal Expert Designations:	May 17, 2021
5	5. Dispositive Motions:	July 14, 2021
6	6. Joint Pre-Trial Order:	August 13, 2021

7 While the parties would like to reach a settlement, due to Covid-19, there have
 8 been delays in conducting discovery and the parties recently reach an agreement to
 9 allow Plaintiff to amend the Complaint to add another Defendant. As such, Plaintiff is
 10 in the process of Amending the Complaint. Therefore, the parties need additional time
 11 to conduct discovery in preparation for initial expert disclosures. Moreover, additional
 12 time is required to conduct any additional written discovery, schedule depositions and
 13 to complete discovery. Accordingly, the parties are requesting a 90-day extension to
 14 all discovery deadlines.

15 The instant request comports with Local Rule IA 6-1, in that no request is being
 16 made after the expiration of the specified period.

17 **I. LOCAL RULE 26-3 IS SATISFIED**

18 The instant request to extend discovery deadlines satisfies the requisites of Local
 19 Rule 26-3. Additionally, good cause exists for the extension. While the parties would
 20 like to reach a settlement, due to Covid-19, there have been delays in conducting
 21 discovery and the parties recently reach an agreement to allow Plaintiff to amend the
 22 Complaint to add another Defendant. As such, Plaintiff is in the process of Amending
 23 the Complaint to add another Defendant. Therefore, the parties need additional time to
 24 conduct discovery in preparation for initial expert disclosures. Moreover, additional
 25 time is required to conduct any additional written discovery, schedule depositions and
 26 to complete discovery. As a result, the parties request all discovery deadlines be
 27 extended 90-days.

28 Listed below is a statement specifying the discovery completed in this case:

1	Plaintiff's Initial Disclosures Pursuant to Fed. R. Civ. P. 26(a)(1)	September 24, 2020
2	Defendant James River Insurance Company's Initial Early Case Conference List of Witnesses and Documents Pursuant to FRCP 26(a)(1)	October 30, 2020
3	Plaintiff's First Set of Requests for Production To Defendant	January 7, 2021
4	Defendant James River Insurance Company's First Supplement to Early Case Conference List of Witnesses and Documents Pursuant to FRCP 26(a)(1)	February 8, 2021
5	Defendant James River Insurance Company's Responses to Plaintiff's First Set of Requests for Production of Documents	February 8, 2021
6	First Supplement to Plaintiff's Initial Disclosures Pursuant to Fed. R. Civ. P. 26(a)(1)	March 10, 2021

Due to Covid-19, there have been delays in conducting discovery and the parties recently reach an agreement to allow Plaintiff to amend the Complaint to add another Defendant. As such, Plaintiff is in the process of Amending the Complaint. Therefore, the parties need additional time to conduct discovery in preparation for initial expert disclosures. Moreover, additional time is required to conduct any additional written discovery, schedule depositions and to complete discovery. As a result, the parties request all discovery deadlines be extended 90-days. Due to the fact that a new Defendant is being added to the litigation, it is necessary to extend the discovery deadlines so there is time to procure all relevant records, exchange any additional written discovery, obtain experts, schedule depositions and conduct any other necessary discovery.

Finally, under Local Rule 26(4), it is necessary to articulate a proposed schedule for completing all remaining discovery. The parties are requesting an additional 90 days be afforded for discovery.

The following deadlines are requested.

1. Discovery Cutoff Date: September 13, 2021
2. Amendment of Pleadings: June 15, 2021

3. Expert Designations:	July 15, 2021
4. Rebuttal Expert Designations:	August 16, 2021
5. Dispositive Motions:	October 13, 2021
6. Joint Pre-Trial Order:	November 12, 2021

The parties hereby stipulate to the proposed changes in the discovery deadlines.

Dated this 15th day of March 2021

Dated this 15th day of March 2021

COGBURN LAW

BREMER WHYTE BROWN &
O'MEARA, LLP

By: /s/ Joseph J. Troiano

Jamie S. Cogburn, Esq.

Nevada Bar No. 8409

Joseph J. Troiano, Esq.

Joseph J. Holano, Esq.
Nevada Bar No. 12505

Nevada Bar No. 12505
Attorneys for Plaintiff

Attorneys for Plaintiff
Mark A. St. Amand

Mark A. St. Annland

By: /s/ Deleela M. Weinerman

Lucian J. Greco, Jr., Esq.

Nevada Bar No. 10600

Jared G. Christensen, Esq.

Jared G. Christensen, Esq.
Nevada Bar No. 11538

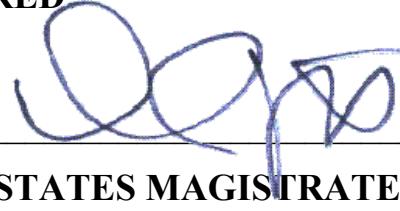
Nevada Bar No. 11558

Deccela M. Weinermair
Nevada Bar No. 13085

Nevada Bar No. 15983
Attorneys for Defendant,
James River Insurance Company

1 ORDER
2
3

4 IT IS SO ORDERED:
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6 UNITED STATES MAGISTRATE JUDGE
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8 Dated: March 16, 2021
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10 The STIPULATION AND ORDER TO EXTEND DISCOVERY (FIRST
11 REQUEST) in 2:20-cv-01666-JCM-DJA was submitted by:

12 BREMER WHYTE BROWN & O'MEARA LLP
13

14 By: /s/ Deleela M. Weinerman
15

16 Lucian J. Greco, Jr, Esq.
17 Nevada State Bar No. 10600
18 Jared G. Christensen, Esq.
19 Nevada State Bar No. 11538
20 Deleela M. Weinerman
21 Nevada State Bar No. 13985
22 Attorneys for Defendant,
23 James River Insurance Company
24
25
26
27
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